

OFFICE OF INSPECTOR GENERAL JEFFERSON PARISH



FOLLOW-UP OF RICKEY JACKSON COMMUNITY HOPE CENTER

2014-0027

FOLLOW-UP REVIEW
ISSUED 7/24/2020



OFFICE OF INSPECTOR GENERAL
JEFFERSON PARISH



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July 24, 2020

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Audit #2014-0027's Follow-Up Audit of Rickey Jackson Community Hope Center, dated 04/18/2016

The Jefferson Parish Office of Inspector General (JPOIG) conducted a **follow-up review** of the **Audit of Rickey Jackson Community Hope Center (2014-0027), dated 04/18/2016**. Follow-up reports make no findings or recommendations. Follow-up reports monitor the implementation of recommendations previously made. The review demonstrates that majority of the JPOIG's recommendations were resolved. Four recommendations are resolved-in-part, and two recommendations remain unresolved. Resolution of the issues fall primarily with the Jefferson Parish Administration and Department of Community Development.

The audit follow-up process does not require a written response, nor do we include any external commentary as each finding has already been addressed through the Department of Community Development and Yenni Administration's initial response to the original report. In the interest of facilitating positive change, we will make arrangements to meet with any recipient who may wish to discuss the report or a corrective action plan.

I appreciate the sincere and earnest efforts by the staff of the Department of Community Development and others in the Administration who worked with us during this effort

Respectfully,

David McClintock

cc:

Steve LaChute, Chief Operating Officer

Gregory Giangrosso, CAA

Commissioner Howard G. Maestri, Chairman

Commissioner Warren R. Bourgeois III, M.D.

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Date of Report: 07/24/2020	PUBLIC FOLLOW-UP REVIEW	Case: 2014-0027
Period of Review: 1/01/2017 – 05/07/2020	Report By: JPOIG Staff	Status: Final
<u>Subject of Review</u> Rickey Jackson Community Hope Center-Courage House		

STANDARDS

Pursuant to the Jefferson Parish Code of Ordinances (JPCO) § 2-155.10(11)(a), the Jefferson Parish Office of Inspector General (JPOIG) initiated a follow-up review of JPOIG’s audit report numbered 2014-0027 dated 04/18/2016. The follow-up audit was performed in accordance with the code of ethics and standards of the International Professional Practices Framework (IPPF), promulgated by the Institute of Internal Auditors (IIA).

ACRONYMS

The following acronyms appear in the document:

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|---|---|
| JPOIG Jefferson Parish Office of Inspector General | CEA Cooperative Endeavor Agreement |
| Parish Jefferson Parish | CDBG Community Development Block Grant |
| JPCO Jefferson Parish Code of Ordinances | RJCHC Rickey Jackson Community Hope Center-Courage House |
| JPDCD Jefferson Parish Department of Community Development | |

INTRODUCTION

The focus of the original audit report was an audit of public funds paid to the Rickey Jackson Community Hope Center – Courage House (RJCHC). The public funds received by the RJCHC were pursuant to a cooperative endeavor agreement (CEA) entered into with Jefferson Parish (Parish). The sources of the public funds were grant money secured under the federal Community Development Block Grant (CDBG) program, and certain Parish district funds. The scope and objective of the original audit reviewed internal control processes and procedures, compliance with contracts and regulations, supporting documentation, transaction monitoring and oversight, and safeguarding of assets.

BACKGROUND

On 04/18/2016, the JPOIG issued a public report titled, “Rickey Jackson Community Hope Center,” which included a response by the Jefferson Parish Department of Community Development (JPDCD) and Yenni Administration. A copy of the full report can be located at the JPOIG’s website. The report’s audit period was 02/18/2013 – 07/31/2015. The audit resulted in 12 findings and 3 observations related to the absence of comprehensive written procedures regarding oversight and monitoring, ineffective management of the process by the JPDCD, and failure to manage the grant in accordance with several areas. Questioned funds totaled \$158,238.73 and avoidable costs determined were \$7,194.15. Follow-up reports make no findings or recommendations. The purpose of a follow-up is to determine if the Parish has taken any actions that were committed to during the original response or any other corrective measures that impact the original report’s findings and recommendations.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objective

The primary objective of the follow-up audit is to determine whether the Parish’s management has effectively implemented the recommendations made in the JPOIG’s original audit report. Additionally, the follow-up will also evaluate the efficiency and effectiveness of any efforts made to address the recommendations.

The current CEA, pursuant to Resolution No. 132892, governs the business relationship between the Parish and the RJCHC. The agreement has a 2 year term, 02/04/2019 through 02/04/2021. The funding for the RJCHC’s services was at a cost not to exceed \$40,000. However, an amendment to the current CEA, pursuant to Resolution No. 134285, increased the maximum amount of funding to \$90,000. The follow-up included testing on compliance-related matters delineated in the CEA. Additionally, the JPOIG reviewed the JPDCD’s policies and procedures, 73 pages in length, implemented after the issuance of the original audit report. If matters not addressed in the original audit were noted as part of this effort, additional observations will be included as part of the follow-up report.

Scope and Methodology

To accomplish the above objectives, the following procedures were performed:

- A review of applicable resolutions and contracts between the Parish and the RJCHC;
- Interviews with the JPDCD’s management to determine if corrective action plans have been effectively implemented since the issuance of the original report;
- Research and analysis including but not limited to, transaction activity between the Parish and the RJCHC, the RJCHC’s supporting documentation for reimbursement, and monitoring and compliance actions by the JPDCD;
- A review of documents by the RJCHC as required by the CEA; and
- A review of the JPDCD’s policies and procedures.

Testing of actual reimbursements served as the cornerstone of the follow-up. In total, the Parish reimbursed the RJCHC 13 times in 2018. To receive a reimbursement, the RJCHC submits supporting documentation of an invoice and proof of payment to the Parish. Each reimbursement request contains multiple instances. Hence, the 13 processed reimbursements actually contained 135 documents across 9 classifications from 2018. The testing was designed to determine if supporting documentation met criteria consistent with the original findings and recommendations. The total reimbursement claims tested totaled to \$57,522.22.

Of the 135 documents tested, 9 documents, representing 7%, have exceptions pertaining to findings from the original audit report. The observations noted at the end of this follow-up report pertained to 32 of the documents tested, representing 24% of the total documents.

Classification	Documents Tested
Staff Payments	65
Utilities	25
Insurance	14
Food	8
Fuel	8
Vehicle Expenses	4
Professional Services	4
Office Supplies	2
Miscellaneous	5
Total Documents Tested	135

The JPOIG determined that 10 of the 12 recommendations were resolved, 1 recommendation was resolved-in-part, and 2 recommendations were unresolved. A discussion of each recommendation is detailed in the “Follow-up Results” section. The table below summarizes the results of the JPOIG follow-up audit by finding. Some findings have multiple recommendation elements:

Finding	Topic	Items Reviewed	Resolved	Un-Resolved	Resolved In-Part
#1	Payment Requests Not Reviewed by Parish	135	✓		
#2	Purchase Order Discrepancies	135	✓		
#3	Insurance Policy Date Discrepancies	135			✓
#4	Sub-recipient Physical Inventory Inspection	0		✗	
#5	Disposition of Fixed Assets	0		✗	
#6	Narrative Operational Reports	0			✓
#7	Inadequate Supporting Documentation	135	✓		
#8	Undocumented Cash Payments	135			✓
#9	Lack of Competitive Bidding Process	1	✓		
#10	Overpayment to Sub-recipient	0			✓
#11	Payment Mark-ups	135	✓		
#12	Commingling Parish Funds	135	✓		

FOLLOW-UP RESULTS

The three (3) potential categories of corrective action are:

1. Resolved - The Department/Parish/Entity has implemented actions that have, or should if implemented, resolve the core findings/concerns noted in the original report.
2. Resolved, in part - The Department/Parish/Entity has implemented actions in response to the audit, but the actions do not fully address the findings/concerns raised in the original report.
3. Unresolved – The Department/Parish/Entity has not implemented actions that resolve the core findings/concerns noted in the original report and/or rejected the recommendation in the original report.

For each finding in JPOIG’s audit report numbered 2014-0027 dated 04/18/2016, below is a summary of the JPOIG’s recommendation, the Parish’s response, and actions taken to determine if the finding has been resolved.

Finding #1	Three (3) Parish payment requests totaling \$45,043.25 were not properly approved.	Resolved
JPOIG Recommendation		
<p>The Parish should ensure that payment requests are reviewed and signed by the Responsible Department, the Finance Department, and the RJCHC or the applicable subrecipient.</p> <p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs, which authorizes reimbursement by the Accounting Department only when the Request for Payment Form includes all required approvals.</p>		
Parish’s Response		
<p>“Current policy within Community Development will ensure that payment requests are reviewed for accuracy and signed by the responsible departments, such as Finance, and the applicable subrecipient and ensure that reimbursements will only be issued when the Request for Payment Form includes all required approvals.”</p>		
Validation Results		
<p>The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and the sample of 13 processed reimbursements in 2018 to the RJCHC. The JPOIG confirmed that the departments and the RJCHC reviewed and signed the RJCHC’s payment requests. Upon reviewing the ordinances, contracts, and policies and procedures, the JPOIG found that the JPDCD implemented a policy and procedure to monitor CEA compliance with contract requirements.</p>		

Finding #2	Descriptions on 2 purchase orders generated by Community Development totaling \$41,691 did not match the invoice provided by the RJCHC.	Resolved
JPOIG Recommendation		
<p>Policy and procedure must ensure that purchase order descriptions accurately reflect the data provided on the invoice and/or change order to ensure the validity and accuracy of the transaction.</p> <p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs, which includes an invoice purchase/change order review and verification prior to reimbursement.</p>		
Parish's Response		
<p>"... the software has been programmed to prevent this from happening in the future, there has not been a similar incident since this adjustment."</p>		
Validation Results		
<p>The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. The JPOIG confirmed that all of the supporting documentation for each payment request showed evidence that the JPDCD tested the invoices and proof of payments for review and verification prior to reimbursement. Upon reviewing the ordinances, contracts, and policies and procedures, the JPOIG found that the JPDCD implemented a policy giving a systematic procedure on how the department is to review invoices prior to reimbursement.</p>		

Finding #3	The effective dates for insurance coverages were prior to the effective date of the CEA.	Resolved, in part
JPOIG Recommendation		
<p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs that ensures reimbursement for term based services (i.e. insurance) are not paid for period of service or coverage outside of the effective period of the CEA.</p>		
Parish's Response		
<p>"Current policy of The Department of Community Development ensures that reimbursements for term based services (i.e. insurance) are not paid for periods of service or coverage outside of the effective period of the CEA. We will also continue to monitor the subrecipient to ensure compliance. The Parish will seek reimbursement for funds paid outside of the terms of the agreement."</p>		
Validation Results		
<u>Pre-Report Expenditures:</u>		
<p>The JPDCD could not locate any documentation showing that the Parish requested and collected reimbursement of the \$2,144.06 paid to the RJCHC for insurance costs outside of the effective period of the CEA. It should be noted that the Parish's response indicated the funds would be recovered.</p>		

Post Report Oversight:

The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC’s documentation for 2018’s processed reimbursements. In this review, the JPOIG observed a lack of sufficient information in the supporting documentation for 6 reimbursements to determine the period of service or coverage for the reimbursed term based services. Further, the invoice amount and payment amount submitted by the RJCHC in an additional 2 reimbursements did not agree. These payments lacking supporting documentation, with a total value of \$6,344.44, represent 11% of the \$57,522.22 reimbursed to the RJCHC in 2018.

Finding #4	Failure to perform a physical inspection of the RJCHC inventory to ensure existence and completeness.	Unresolved
JPOIG Recommendation		
<p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs that requires an inspection of inventory to safeguard Parish assets and to ensure accuracy, existence, and completeness of inventory.</p> <p>If entities know that an inventory will be taken and items are being tracked, there is a greater likelihood that incidences of theft will decrease. Furthermore, if equipment is lost, stolen, or destroyed, an accurate inventory would help greatly when filing a claim with the insurance company.</p>		
Parish’s Response		
<p>“Although there was not a policy in the past administration to take an ‘on sight’ inventory of movables purchased through public funds, the Yenni Administration has required departments to do so. Further the inventory at RJCHC will be labeled as assets of Jefferson Parish and documented accordingly.</p> <p>The Administration will consult with the Parish Attorney’s office and request that all CEAs will include a clause stating that any movable property of sufficient value purchased with public money is Parish property and cannot be alienated at the end of its use. The property must be treated as surplus property in accordance with state law.”</p>		
Validation Results		
<p>The JPOIG reviewed Parish ordinances, resolutions and contracts, and departmental policies and procedures. Upon reviewing the ordinances, contracts, and policies and procedures, the JPOIG observed that a policy and procedure requiring an inspection of inventory to safeguard Parish assets and to ensure accuracy, existence, and completeness of inventory for CEAs was not implemented. In July 2020, the RJCHC submitted their first inventory list and the JPDCD verified the inventory. The creation of a written policy and procedure applying to all CEAs regarding an inspection of subrecipients’ inventory would help safeguard Parish assets and decrease the incidences of theft. Until consistent physical inspections can be performed on RJCHC’s inventory, the Parish will not be able to identify assets bought with public funds.</p>		

Finding #5	The Parish system of grant management fails to address the ownership and disposition of the RJCHC inventory purchased with public funds, including grant funds, at termination of the CEA.	Unresolved
JPOIG Recommendation		
The JPOIG recommends the Parish establish written policy and procedure for the oversight and management of all CEAs that addresses ownership and disposition of items purchased with Parish funds by non-governmental entities after termination of the CEA.		
Parish's Response		
"See the Corrective Action outlined in Finding #4."		
Validation Results		
The JPOIG reviewed Parish ordinances, resolutions and contracts, and departmental policies and procedures. Upon reviewing the ordinances, contracts, departmental documentation, and policies and procedures, the JPOIG observed that a current policy and procedure addressing ownership and disposition of items purchased with Parish funds by non-governmental entities after termination of the CEA was not implemented. The creation of a written policy and procedure addressing ownership and disposition of items purchased with Parish funds by non-governmental entities after termination for all CEAs would help safeguard Parish assets and increase fiscal savings.		

Finding #6	Failure to comply with CEA Section 11 - Narrative Reports.	Resolved, in part
JPOIG Recommendation		
The required RJCHC expenditure narrative reports should be submitted to the Parish Internal Auditor for an independent review to help ensure expense accuracy and validity.		
The Parish also needs to notify the Internal Auditor that he/she should expect these reports. The Internal Auditor will be able to identify those entities which are not in compliance with the CEA.		
Parish's Response		
"As stated in the CEA, Section 11-Narrative Reports, JPCD will advise the subrecipient of the requirement to submit expenditure narrative reports directly to the Parish Internal Auditor, Tommy Fikes as an independent review to ensure expense accuracy and validity. Also, Internal Auditor, as the responsible department of the Parish, having the responsibility to provide independent review to ensure expense accuracy and validity shall provide the appropriate training, as recommended by JPOIG. The Administration will put policy in place to ensure that the Internal Auditor is included in the process."		
Validation Results		
The JPOIG reviewed Parish ordinances, resolutions and contracts, and departmental policies and procedures. Upon reviewing the ordinances, contracts, departmental documentation, and policies and procedures, the JPOIG observed that a policy and procedure addressing submitting expenditure narrative reports to the Parish's Internal Auditor was not implemented. The Parish also included a clause in the RJCHC contract dated 01/05/2017, requiring the RJCHC to furnish certain narrative reports to the Parish Internal Auditor demonstrating the amounts and supporting		

documentation for all expenditures. This section is still present in the current CEA. Further, this section is now a part of the Parish's standard CEA form. To date, the Internal Auditor has not received any reports related to RJCHC. The Parish should reconsider whether the Internal Auditor is the appropriate person to receive and monitor such reports, with the alternative being the JPDCD.

Finding #7	Failure to provide timely proof of vendor payments to the Parish for expense reimbursements totaling \$158,238.73.	Resolved
JPOIG Recommendation		
<p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs that prohibits payments to non-governmental entities without adequate supporting documentation. That documentation must include, at a minimum, a copy of the invoice and proof of vendor payment. The invoice must detail the item or service purchased, the date, and the amount. These items must be verified and approved by Parish staff.</p>		
Parish's Response		
<p>"The Department of Community Development will continue to require adequate supporting documentation that includes, at a minimum, a copy of the invoice and proof of vendor payments, as recommended by the JPOIG. These invoices and proof of vendor payments will be independently verified and approved by the Parish staff. The Yenni Administration will make policy that any CEA's that include reimbursement payments will include strict timelines."</p>		
Validation Results		
<p>The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. All of the documentation reviewed contained invoices and proof of payments submitted by the vendor. Additionally, each document showed evidence that the JPDCD reviewed the invoices and proof of payments. The JPDCD denied payments to RJCHC if an invoice or proof of payment was missing. The JPDCD also implemented a policy prohibiting payments to non-governmental entities without adequate supporting documentation.</p>		

Finding #8	The Parish reimbursed the RJCHC for a cash payment of \$1,478.52 for the purchase of limestone without adequate supporting documentation.	Resolved, in part
JPOIG Recommendation		
<p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs that the Parish not allow reimbursement for cash payments. This provision should be considered for adoption into ordinance and be incorporated into the CEA. Payments by check provide a more accurate, easy to follow, audit trail.</p>		
Parish's Response		
<p>"Although there is not a policy or procedure in place, this administration agrees that any reimbursement by the Parish will be for monies expended by check or other negotiable instrument along with verified supporting documentation."</p>		

Validation Results

The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC’s documentation for 2018’s processed reimbursements. All of the documentation reviewed showed evidence of the JPDCD denying reimbursements if the proof of payment was a cash payment. But, the JPDCD did not implement a policy prohibiting reimbursement of cash payments.

Finding #9	Failure to comply with CDBG funding rules 24 CFR 85.36 and 84.44, the competitive bid process.	Resolved
JPOIG Recommendation		
<p>The JPOIG recommends the Parish require written policy and procedure for the oversight and management of all CEAs that mandate compliance with federal, state or Parish imposed grant provisions pertaining to bid processes, quotes and estimates. In this case CDBG funding requirements found in 24 CFR 85.36(d) (1) and 84.44(e) (2).</p> <p>Provisions of this nature are designed to ensure subrecipients make sufficient effort to ensure public funds are expended in a cost effective manner.</p>		
Parish’s Response		
<p>“The Department of Community Development will work diligently to monitor the RJCHC as well as other grantees to ensure compliance with CDBG funding regulations 24 CFR 85.36 (d)(1), and 84.44(e)(2), when federal funds are involved.”</p>		
Validation Results		
<p>The JPOIG reviewed Parish ordinances, resolutions and contracts, and departmental policies and procedures. The JPOIG found that the JPDCD implemented a policy and procedure that the Parish and subrecipients shall comply with the Parish and federal regulations regarding CDBG funded projects.</p>		

Finding #10	The Parish reimbursed the RJCHC for contracting, insurance, utilities, and lawn service expenses totaling \$49,304.79. However, the RJCHC paid its vendors \$42,110.64 resulting in the Parish overpaying the RJCHC expenses in the amount of \$7,194.15.	Resolved, in part
JPOIG Recommendation		
<p>The Parish should reconcile the RJCHC vendor payments with the Parish reimbursements, resolve any differences, and collect any overpayments. Additionally, the Parish should ensure that ordinances, policies, and procedures require reasonable and verifiable reconciliation prior to issuance of payment.</p>		
Parish’s Response		
<p>“The Department of Community Development will monitor all expense documentation to ensure that expenses are accurate and valid prior to reimbursement with public funds. The Department has withheld payments to RJCHC in the amount of \$3,125.63. The remaining overpayment of \$400.00 is disputed by RJCHC. We will also work to reconcile the RJCHC vendor payments, resolve any differences, and collect any and all overpayments.”</p>		

Validation Results

Pre-Report Expenditures:

Of the \$7,194.15 in overpayments identified, the JPOIG validated that \$3,125.63 was withheld as indicated in the Parish's response. Thus, the remaining overpayment amount is \$4,068.52. The JPDCD was unable to produce documentation that the remaining amount was collected or withheld from future payments.

Post Report Oversight of RJCHC:

The JPOIG determined that after the issuance of the audit report the JPDCD substantially improved its review and payments process. The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. All of the supporting material reviewed showed that the JPDCD is adequately monitoring documentation to ensure that expenses are accurate and valid prior to reimbursement. The JPOIG also observed that the JPDCD reconciled the documentation provided by the RJCHC and resolved any differences prior to payment. Additionally, the JPOIG found that the JPCO § 2-925.1 states that payments are to be made only on amounts actually incurred and supported by documentation. The ordinance dictates this requirement for all CEAs.

Finding #11	Failure to comply with CEA Section 3 – Payment (i).	Resolved
JPOIG Recommendation		
The JPOIG recommends the Parish require written policy and procedure for the oversight and management that prohibits reimbursement for markups on cost in accordance with CEA Section 3- Payment, and other provisions as appropriate.		
Parish's Response		
"The Department of Community Development will monitor compliance with the CEA with RJCHC as it relates to Section 3-Payment as well as other terms and conditions in the CEA."		
Validation Results		
The JPOIG reviewed Parish ordinances, resolutions and contracts, departmental policies and procedures, and a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. All of the documentation reviewed showed evidence that the JPDCD was reviewing and verifying the documents for compliance. Additionally, the JPOIG found that the JPCO § 2-925.1(b)(2) states that all CEAs entered into between the parish and any non-governmental entity shall contain "The total amount and schedule of any payments to be made. All payments made shall be without increase or mark-up..."		

Finding #12	RJCHC comingled Parish funds with a non-RJCHC account.	Resolved
JPOIG Recommendation		
Public funds should not be comingled with funds not connected with the account(s) of the non-governmental entity in which the Parish has entered into a CEA. The JPOIG recommends that the Parish require grant recipients to maintain grant funds in a separate account. To ensure a proper audit trail, the non-governmental entities expenses (payments) and the subsequent Parish		

reimbursements (deposits) should be required to be processed through the entity's official account(s). Additionally, grantees should be required to sign an attestation that grant funds will not be comingled with any other public or private funds.

Parish's Response

“The Department of Community Development understands the risks of comingling funds as stated by the JPOIG. Going forward, JPCD will require all grantees that have entered into a CEA with the Parish, to sign an attestation which states that grant funds will not be comingled with any other public or private funds. (Attachment A)”

Validation Results

The JPOIG reviewed Parish ordinances, resolutions and contracts, and departmental policies and procedures. The JPOIG found that all grantees that have entered into a CEA with the Parish are required to sign an attestation, which states that grant funds will not be comingled with any other public or private funds.

OBSERVATIONS

1. Carryover Balances/Late Fees

The CEA between Jefferson Parish and the RJCHC states that payment to the vendor is on a reimbursement basis. The vendor has to provide an invoice and proof of payment to receive the reimbursement. This process ensures that the Parish only pays what is necessary in accordance with the CEA.

The JPOIG reviewed a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. The JPOIG observed that some of the utility invoices contained carryover balances from the previous billing period. In addition, the amount paid by the RJCHC was not the full amount due for that bill, resulting in more carryover balances with late fees for future billing periods. These occurrences raise the question of whether the Parish reimbursed late fees in these partial payments, which are ineligible for reimbursement. The JPOIG recommends that the Parish create a policy and procedure prohibiting vendors from seeking reimbursement on partial payments that result in carryover balances.

2. Questionable Purchases

The JPDCD reviews invoices and proof of payments submitted by the RJCHC to ensure that the requested reimbursements are allowable. In the JPDCD's review, the Program Manager analyzes the invoices and proof of payments to ensure that the invoices are valid, proof of payments are not made by cash, and other various factors that would result in denying the requested reimbursement.

The JPOIG reviewed a sample of 135 expenditure transactions in the RJCHC's documentation for 2018's processed reimbursements. The JPOIG observed the supporting documentation contained receipts for reimbursement of fuel and food expenses. However, the supporting documentation did not show that the expenses were job related. For example, in July 2018, the RJCHC submitted documentation of the staff's time cards. The latest shift recorded is 2:30 PM - 6:30 PM. The RJCHC submitted a receipt for food bought at McDonald's with a credit/debit card for reimbursement. The date and time on the receipt is 08/16/2018 at 6:42 PM. And again, a receipt for food bought at Popeye's at 6:27 PM was submitted. Receipts for purchases of fuel did not give any supporting documentation as to whether the fuel was needed for a job related

activity and as to which vehicle was receiving the fuel. These payments with inadequate supporting documentation, totaling \$1,226.92, represent 2% of the \$57,522.22 reimbursed to RJCHC in 2018.